

Exhibit A

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19 **UNITED STATES BANKRUPTCY COURT**
20 **NORTHERN DISTRICT OF CALIFORNIA**
21 **OAKLAND DIVISION**

22 In re:

23 THE ROMAN CATHOLIC BISHOP OF
24 OAKLAND, a California corporation sole,

25 Debtor.

26 Case No. 23-40523 WJL

27 Chapter 11

28 **[PROPOSED] ORDER, PURSUANT TO
BANKRUPTCY RULES 9006 AND 9027,
ENLARGING THE PERIOD WITHIN
WHICH THE DEBTOR MAY REMOVE
ACTIONS PURSUANT TO 28 U.S.C. § 1452**

29 Judge: Hon. William J. Lafferty

30 Date: August 22, 2023

31 Time: 1:30 p.m.

32 Place: United States Bankruptcy Court
33 1300 Clay Street
34 Courtroom 220
35 Oakland, CA 94612

1 Upon the *Debtor's Motion for Entry of an Order, Pursuant to Bankruptcy Rules 9006 and 9027,*
2 *Enlarging the Period Within Which the Debtor May Remove Actions Pursuant to 28 U.S.C. § 1452*, dated
3 August 1, 2023 (the “Motion”),¹ filed by The Roman Catholic Bishop of Oakland, a California corporation
4 sole, and the debtor and debtor in possession (the “Debtor”) in the above-captioned chapter 11 bankruptcy
5 case (the “Chapter 11 Case”), seeking an enlargement of time for the Debtor to file notices of removal of
6 the civil actions and proceedings to which the Debtor is a party from August 7, 2023 through and including
7 February 5, 2024, all as more fully set forth in the Motion; and this Court having jurisdiction to consider
8 the Motion and the relief requested therein pursuant to 28 U.S.C. §§ 157 and 1334, *Order Referring*
9 *Bankruptcy Cases and Proceedings to Bankruptcy Judges*, General Order 24 (N.D. Cal.), and Bankruptcy
10 Local Rule 5011-1(a); and consideration of the Motion and the requested relief being a core proceeding
11 pursuant to 28 U.S.C. § 157(b); and venue being proper before this Court pursuant to 28 U.S.C. §§ 1408
12 and 1409; and the Court having found and determined that notice of the Motion as provided to the parties
13 listed therein is reasonable and sufficient under the circumstances, and it appearing that no other or further
14 notice need be provided; and this Court having reviewed the Motion, the First Day Declaration, and the
15 Bongiovanni Declaration; and this Court having held a hearing on the Motion; and this Court having
16 determined that the legal and factual bases set forth in the Motion establish just cause for the relief granted
17 herein; and it appearing that the relief requested in the Motion is in the best interests of the Debtor, its
18 estate, creditors, and all parties in interest; and it appearing that cause exists to grant the relief requested
19 in the Motion; and upon all of the proceedings had before this Court and after due deliberation and
20 sufficient cause appearing therefor,

21 **IT IS HEREBY ORDERED THAT:**

22 1. The Motion is GRANTED as provided herein.

23 2. Pursuant to 28 U.S.C. § 1452 and Bankruptcy Rules 9006(b)(1) and 9027(a), the Removal
24 Period during which the Debtor may file notices of removal of claims or causes of action in a civil
25 proceeding is extended from the Current Removal Deadline of August 7, 2023, through and including
26 February 5, 2024.

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¹ Capitalized terms used but not defined herein shall have the meanings ascribed to them in the Motion.

3. The Debtor is authorized to take all actions necessary or appropriate to effectuate the relief granted in this Order.

4. This Order shall be without prejudice to (a) any position the Debtor may take regarding whether section 362 of the Bankruptcy Code applies to stay any litigation pending against the Debtor, or (b) the Debtor's right to seek further extensions of the Removal Period.

5. Notwithstanding entry of this Order, nothing herein shall create, nor is it intended to create, any rights in favor of or enhance the status of any claim held by, any party.

6. This Court shall retain jurisdiction with respect to all matters arising from or related to the implementation of or interpretation of this Order.

** END OF ORDER **

COURT SERVICE LIST

All ECF Recipients.